

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

WOODMEN OF THE WORLD LIFE
INSURANCE SOCIETY, a Nebraska Not for
Profit Fraternal Benefit Society,

Plaintiff,

v.

U.S. BANK NATIONAL ASSOCIATION;
U.S. BANCORP ASSET MANAGEMENT,
INC., f/k/a FAF ADVISORS, INC. a Delaware
Corporation; U.S. BANCORP, a Delaware
Corporation; and EMIL C. BUSSE, JR.,

Defendants.

Civil Case No. 8:09-cv-00407V
(JBF/TDT)

**DEFENDANT EMIL C. BUSSE,
JR.'S EXPEDITED MOTION FOR
LEAVE OF COURT TO SERVE
ADDITIONAL
INTERROGATORIES AND TO
COMPEL ANSWERS TO
INTERROGATORIES AND
RESPONSES TO REQUEST FOR
DOCUMENTS DIRECTED AT
WOODMEN**

TO: PLAINTIFF ABOVE-NAMED AND ITS ATTORNEYS, PATRICK G. VIPOND, ESQ., MARK NOVOTNY, ESQ., CATHY TRENT-VILIM, ESQ., LAMSON, DUGAN AND MURRAY, LLP, 10306 REGENCY PARKWAY DRIVE, OMAHA, NE 68114-3743 AND DEFENDANTS U.S. BANK NATIONAL ASSOCIATION; U.S. BANCORP ASSET MANAGEMENT, INC., F/K/A FAF ADVISORS, INC., A DELAWARE CORPORATION; U.S. BANCORP, A DELAWARE CORPORATION AND ITS ATTORNEYS STEVE W. GASKINS, NICHOLAS ROGERS, SARA H. DAGGETT, ROBERT W. VACCARO, GASKINS BENNETT BIRRELL SCHUPP, L.L.P., 333 SOUTH 7TH STREET, SUITE 2900, MINNEAPOLIS, MN 55402.

Defendant, Emil C. Busse, Jr. ("Busse"), pursuant to Fed. R. Civ. P. 26(b)(2),

33(a) and 37, hereby seeks leave of Court to serve additional interrogatories and to compel answers and responses to written discovery directed at Plaintiff Woodmen of the World Life Insurance Society. This motion is based on Busse's Index of Evidence Supporting this motion; the Affidavit of Robert J. Hennessey dated April 2, 2012 with Exhibits A-D; and, supporting Memorandum of Law.

Dated: April 2, 2012

LINDQUIST & VENNUM PLLP

By /s/ Robert J. Hennessey
Robert J. Hennessey (#44118)
Jonathan M. Harris (#0323962)
Daniel J. Sheran (#100183)
4200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402-2274
(612) 371-3211
(612) 371-3207 (facsimile)

**COUNSEL FOR DEFENDANT
EMIL C. BUSSE, JR.**

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of April, 2012, a true and accurate copy of the foregoing document was served upon the following via first class U.S. Mail, postage prepaid:

Cathy S. Trent-Vilim, Esq.
Patrick Vipond, Esq.
Mark Novotny, Esq.
Lamson, Dugan and Murray, LLP
10306 Regency Parkway Drive
Omaha, NE 68114-3743

Richard J. Gilloon
Erickson & Sederstrom
One Regency Westpointe
10330 Regency Parkway Drive
Omaha, NE 68114

Steven W. Gaskins, Esq.
Nicholas F. Rogers, Esq.
Sara H. Daggett, Esq.
Robert W. Vaccaro, Esq.
Gaskins, Bennett, Birrell & Schupp, LLP
333 South 7th Street
Suite 2900
Minneapolis, MN 55402

/s/ Robert J. Hennessey
Robert J. Hennessey